WorldCom Proposed Measures for Illinois Code Part 731 – September 14, 2001

In the August 30, 2001 workshop regarding wholesale service performance and remedies, participants agreed to provide a "list of measures and tier designation" that will act as a starting point for discussions about what the universe of performance/quality of service measures are that will be codified in Part 731 of the rules of the Illinois Commerce Commission ("ICC"). What follows is a general description of the concepts and wholesale services for which should be covered by the ICC's wholesale service quality rules and a bare-bones list of performance measures that are, at a minimum, necessary to ensure adequate provision of wholesale services by Incumbent Local Exchange Carriers ("ILECs"). WorldCom submits these comments on behalf of itself and its Illinois operating subsidiaries and emphasizes that these preliminary comments are offered for the purposes of discussion only. WorldCom reserves the right to expand upon, retract and/or refine the substance of these comments. That said, WorldCom respectfully submits these preliminary comments regarding carrier-to-carrier wholesale service quality performance measurements in anticipation of the discussions that will be held at the September 26 workshop being convened at the ICC's offices in Chicago.

Among the broad categories of wholesale services and products that will require performance measures are: special access, Unbundled Network Elements ("UNEs"), combinations of UNEs including the UNE Platform ("UNE-P") and Enhanced Extended Links ("EELs"), and Digital Subscriber Line ("DSL") services. Performance measurements and reporting requirements for these and other wholesale products and services must ensure, at a minimum, a basic level of service quality in addition to providing a mechanism by which the ICC and Competitive Local Exchange Carriers ("CLECs") can discern the extent to which ILECs provide nondiscriminatory access to UNEs, combinations of UNEs, and wholesale services.

As a part of ensuring minimum carrier-to-carrier wholesale quality of service standards, the measures should account for and reflect the retail minimum basic local exchange quality of service standards with which all carriers providing such service must comply. Because of the universe of wholesale services provided by ILECs impacts more than just "basic local exchange" services that other carriers provide, additional measures are necessary to ensure a minimum quality of service for all wholesale services provided by ILECs that impact, for example, what are traditionally thought of as long distance services utilized by Illinois consumers. WorldCom proposes that the measures set forth in this document apply only to larger ILECs operating in the state of Illinois, and suggests that the measures apply to ILECs which serve more than 600,000 access lines utilizing their own facilities.

At a minimum, performance measurements are needed in five key areas for all wholesale services:

- Pre-ordering
- Ordering
- Provisioning
- Maintenance and Repair and
- Billing

Pre-ordering measurements measure the time it takes CLECs to access the incumbent's databases that are necessary for CLECs to submit orders.

Ordering measurements are crucial to assess how efficiently and effectively ILECs process CLEC orders. Examples of ordering measurements include but are not limited to order completion measurements, average time for customer conversion measurement, average interval for held orders measurements and the installation troubles measurement. An ILEC's ability to deliver order status confirmation to CLECs in a timely manner must also be measured. Gauging the efficiency of an ILEC's electronic ordering systems, via an ordering quality measurement, is also important.

Repair and maintenance metrics will enable CLEC customers to measure how proficiently ILECs perform their responsibilities to respond to and correct repair and maintenance problems encountered by CLECs.

Additionally, CLECs must receive accurate and timely billing information from ILECs so CLECs in turn may bill their end users.

A significant problem related to performance measurements is the practice underlying firm order confirmation ("FOC"). FOCs are supposed to be a firm commitment by the ILEC to implement the order by or on the agreed-upon date. In reality, however, FOCs merely function as a recognition or an acknowledgement by an ILEC that it has received the order.

CLECs routinely receive FOCs from ILECs only to be told at a later date that upon checking, ILECs lack the requested facilities and cannot provide the order by the previously agreed to date in the ILEC-issued FOC. This anticompetitive practice upends performance measurements aimed at measuring service installation and order completion and more. CLEC customers in turn do not receive service as promised and blame CLECs for the service installation delay. WorldCom urges the adoption of rules that require ILECs to diligently check for facilities requested in a service order and to do so before responding with an FOC. Such facility checks must be performed to the extent necessary. This may include physical checking and verification of available facilities.

ILEC performance in areas such as providing interconnection to CLECs should also be measured.

Further, the ICC should also consider the appropriate geographic level of reporting. Measurements reported on too broad a basis lend themselves to masking specific problem areas. For example, if measurements are reported on a statewide basis, yet there are distinct markets of competition within the state, such statewide reporting may hide poor performance in one area where competition is more robust, by averaging it with better performance in an area where competition is limited. The ICC should consider requiring reporting on a market-by-market or LATA (local access and transport area) basis.

Following is a more complete list of performance metrics that WorldCom supports and urges the adoption of in the Wholesale Service Quality proceeding workshop.

- Mean Installation Interval
- Accuracy Of Actual Loop Make-up Information For DSL Orders
- OSS Interface Availability
- Percent Firm Order Confirmation Returned Within "X" hours
- Average Time To Return FOC
- Average Time To Return Mechanized Completions
- Percent Rejects
- Percent Mechanized Rejects Returned Within One Hour Of Receipt Of Reject Order
- Percent Manual Rejects Received Electronically And Returned Within Five Hours
- Order Process Percent Flow Through
- Percent Installations Completed Within Customer Requested Due Date
- Average Delay Days On Missed Installation Orders
- Percent Completions/Attempts Without Notice Or With Less Than 24 Hours Notice
- Billing Accuracy
- Billing Completeness
- Billing Timeliness
- Percent Of Accurate And Complete Formatted Mechanized Bills Via EDI, BDT Or CABS
- Percent Of Ameritech Caused Missed Due Dates
- Percent Of Ameritech Missed Due Dates Due To Lack of Facilities
- Percent Missed Repair Commitment of Trouble Within 30 Days
- Percent Trouble Reports Within 30 Days Of Installation
- Trouble Report Rate
- Percent Repeat Reports
- Percent Out Of Service < 24 Hours
- Mean Time To Restore/Repair
- Percent XDSL Capable Loop Orders Requiring Removal Of Load Coils And/Or Repeaters
- Percent Of Updates Completed Into The DA Database Within 72 Hours
- Percent Of Missed Appointments
- Average Interface Outage Notification

- Timeliness Of Change Management Notices
- Percent No Access UNE Loops
- Jeopardy Intervals And Percent Jeopardies
- Missed Repair Appointments
- Missed Installation Appointments
- Percent of Installations Within "X" Business Days
- Percent of Installation Commitments Met
- Average Speed of Answer Business Office
- Average Speed of Answer Repair Office

In addition to the performance measures described above, there should be separate and distinct measures that apply to "Special Access" wholesale services. Timely and nondiscriminatory provisioning of Special Access services is critical to the development of effective local and intrastate competition in Illinois. Special Access circuits provide dedicated connections between locations served by ILECs -- in Illinois principally by Ameritech's and Verizon's networks -- and competing carriers and their customers. WorldCom and other competitive carriers need Special Access to serve business and government customers by purchasing local distribution channels that connect to such customers. So WorldCom and other competitors purchase Special Access Services from Ameritech and Verizon for the same purposes that unbundled network elements or resold services are used – to complete the link to the customer.

When WorldCom searches for facilities over which to provide access services to a customer, it first determines whether WorldCom itself can provide such services over its own network. If no such facilities are available, WorldCom typically searched for facilities owned by other Competitive Access Providers ("CAPs"), because typically CAP services are less expensive and their service organizations are more flexible to work with. However, there are no CAPs or CLECs that have the ubiquitous facilities of large ILECs such as Ameritech and Verizon -- the dominant providers of Special Access services in Illinois. Consequently, WorldCom and other competitive carriers must depend on Ameritech and Verizon for provisioning of Special Access services just as we do for the provision of equivalent high capacity services on an unbundled or resale basis.

Therefore, receiving quality Special Access Service from a dominant ILEC, whether a competing carrier orders that service out of a tariff or an interconnection agreement, is essential to the development of robust competition. Businesses and competitors alike pay the price for poor ILEC Special Access performance. The result of such poor performance is that Illinois businesses have been forced to wait uncertain and unreasonable periods of time for service.

Specific standards and substantial remedies are required to ensure Ameritech and Verizon provide good, nondiscriminatory performance in delivering special access to competitors.

WorldCom has identified the most important metrics to ensure timely delivery of special access service:

FOC RECEIPT. The Firm Order Confirmation ("FOC") is the ILEC response to a WorldCom Access Service Request ("ASR"), whether an initial or supplement ASR, that provides WorldCom with the specific Due Date on which the requested circuit or circuits will be installed.

FOC RECEIPT PAST DUE. Tracks all open ASR requests that have not received a FOC from the ILEC, within the expected FOC receipt interval.

OFFERED VERSUS REQUESTED DUE DATE. Measures the percentage of time the FOC Due Date is equal to the WorldCom requested due date when WorldCom specifically requests a due date that is equal to or greater than the ILEC stated interval.

ON TIME PERFORMANCE TO FOC DUE DATE. Measures the percentage of time that the ILEC completes installation on or before the due date with and without Customer Not Ready ("CNR") consideration.

DAYS LATE. Measures the average number of days late for those orders not completed by the FOC Due Date.

AVERAGE INTERVALS - REQUESTED / OFFERED / INSTALLATION. The intent of this measure is to capture three important aspects of the provisioning process and display them in relation to each other. The Average WorldCom Requested Interval, the Average ILEC Offered Interval, and the Average Installation Interval provide a comprehensive view of provisioning with the ultimate goal to have these three intervals equal.

PAST DUE CIRCUITS. Provides a snapshot view of circuits not completed (that are past the FOC Due Date) as of the end of a reporting period; captures order backlog statistic by monitoring the status of past due orders

NEW INSTALLATION TROUBLE REPORT RATE. Measures the quality of the installation work by capturing the rate of trouble reports on new circuits within 30 calendar days of the installation.

FAILURE RATE. Measures the overall quality of "in service" circuits provided by the ILEC by determining number of troubles occurring and resolved during the reporting period.

MEAN TIME TO RESTORE. Measures the promptness in restoring circuits to normal operating levels when a problem must be referred to the ILEC for resolution.

REPEAT TROUBLE REPORT RATE. Measures the percent of maintenance troubles resolved during the reporting period that had at least one prior trouble ticket at any time in the preceding 30 calendar days from the creation date of the current trouble report.